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February 10, 2017

VIA ECF

Hon. Denise L. Cote
United State District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: In re Application Pursuant to 28 U.S.C. § 1782, No. 14-mc-00258

Dear Judge Cote:

We request that the Court re-open this matter so that Susman Godfrey may appear as counsel of record for Louis Bacon. Under the Protective Order, Susman Godfrey must appear as counsel of record in order to access material designated Confidential or Highly Confidential. *See* Dkt. 72 ¶¶ 7(d), 8(c) (limiting "outside counsel" to those who appeared in this Section 1782 Action or specified Bahamian Actions). Counsel's proposed notices of appearance are attached.

Counsel for respondent Stephen Feralio, and counsel for intervenors Nygård International Partnership, Nygård Inc., and Peter Nygård consent to this request.

Sincerely,

William Christopher Carmody
Enclosures

cc: Counsel of record via ECF

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Application of THE COALITION TO PROTECT CLIFTON BAY and LOUIS BACON for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings	Case No.: 14-MC-258 **NOTICE OF APPEARANCE**

PLEASE TAKE NOTICE THAT the undersigned respectfully enters his appearance as counsel for Petitioner Louis Bacon and has been designated to accept service of all pleadings, notices, filings, correspondence, and other papers relating to this litigation on behalf of Petitioner Louis Bacon. The undersigned is admitted to practice before this Court.

Dated: New York, New York
February 10, 2017

SUSMAN GODFREY L.L.P.

By: /s/ *William Christopher Carmody*

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Application of THE COALITION TO PROTECT CLIFTON BAY and LOUIS BACON for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings	Case No.: 14-MC-258 **NOTICE OF APPEARANCE**

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Dated: New York, New York
February 10, 2017

SUSMAN GODFREY L.L.P.

By: */s/ Jacob W. Buchdahl*

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Attorneys for Petitioner Louis Bacon

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Dated: New York, New York
February 10, 2017

SUSMAN GODFREY L.L.P.

By: _/s/ Stephen Shackelford, Jr._

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Attorneys for Petitioner Louis Bacon

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Application of THE COALITION TO PROTECT CLIFTON BAY and LOUIS BACON for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings	Case No.: 14-MC-258 **NOTICE OF APPEARANCE**

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Dated: New York, New York
February 10, 2017

SUSMAN GODFREY L.L.P.

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